

1 Marc Dawson
2 P.O. Box 3030
High Desert State Prison
3 Susanville, CA 96127-3030
CDCR #P-13296

4 In Pro Per

JUL 21 2008

FILED

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6 **UNITED STATES DISTRICT COURT** Richard W. Wileking
U.S. District Court
Northern District of California
San Jose
7 **NORTHERN DISTRICT OF CALIFORNIA**

8 **Marc Dawson,**

No. C 08-0741 JF (PR)

9 Plaintiff,

REQUEST FOR ADMISSIONS

10 v.

(SET ONE)

11 **S. Latham, et al.,**

(Fed.R.Civ.P.36)

12 Defendants,

Marc Dawson
P.O. Box 3030, Susanville, CA 96127

13
14
15 **PROPOUNDING PARTY:**

PLAINTIFF MARC DAWSON

16 **RESPONDING PARTY:**

DEFENDANT M. EDWARDS

17 **SET NUMBER:**

ONE

18
19 **TO DEFENDANT AND HER RECORD OF COUNSEL:**

20 PLEASE TAKE NOTICE that pursuant to Rule 36 of the Federal Rules of Civil
21 Procedure, Plaintiff MARC DAWSON hereby requests that the Defendant M. EDWARDS is
22 to make the following admissions within 30 days after the service of this request.

23
24 1. Attachment "A" is a report authored by M. EDWARDS.

25 2. M. EDWARDS entered the medical document marked exhibit "A" on 6-10-06.

26 3. M. EDWARDS was assigned as a health care provider on 6-10-06.

27 4. M. EDWARDS recorded the Plaintiff's eye opening response as "4" accord-
28 ing to attachment "A".

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1 5. M. EDWARDS recorded the Plaintiffs best verbal response, according to at-
2 tachment "A", as a "5".

3 6. M. EDWARDS recorded the Plaintiffs best motor response as a "6" according
4 to attachment "A".

5 7. M. EDWARDS recorded the Plaintiffs pupil response, in the right eye, a "B"
6 according to attachment "A".

7 8. On attachment "A" under pupil response, a "B" means "Brisk".

8 9. M. EDWARDS recorded the Plaintiffs pupil response. in the left eye, a "SL"
9 according to attachment "A".

10 10. On attachment "A" under pupil response, a "SL" means "Sluggish".

11 11. M. EDWARDS recorded the Plaintiffs pupil size, in the right eye, as being
12 a "4" according to attachment "A".

13 12. M. EDWARDS recorded the Plaintiffs pupil size, in the left eye, as a "3",
14 according to attachment "A".

15 13. M. EDWARDS recorded a difference in the Plaintiff right eye in comparison
16 to the left eye, according to attachment "A".

17 14. M. EDWARDS used a number scale to identify responses in the 2 boxes under
18 the heading of "Glasgow Coma Scale", according to attachment "A".

19 15. M. EDWARDS is knowledgable with the "Glasgow Coma Scale".

20 16. The Plaintiff notified M. EDWARDS that he had taken the wrong medication,
21 on Thursday, and the problems began afterwards, according to attachment "A".

22 17. M. EDWARDS recorded that the Plaintiffs muscles in his arms and legs were
23 "twitchy and jumpy", according to attachment "A".

24 18. M. EDWARDS recorded that the Plaintiffs head was bent in a forward manner
25 and that the Plaintiff stated that it felt as if someone was pushing down on his head,
26 according to attachment "A".

27 19. M. EDWARDS recorded that the Plaintiff could not put his head straight ac-
28 cording to attachment "A".

1 20. M. EDWARDS did not draw a blood sample from the Plaintiff on 6-10-06.
 2 21. M. EDWARDS did not implement any procedures that would help to identify
 3 what the Plaintiff had taken on 6-8-06.

4 22. M. EDWARDS, after recording the Plaintiff's physical symptoms and condi-
 5 tion on 6-10-06, according to attachment "A", did not implement any procedures that
 6 would identify what the Plaintiff had ingested on 6-8-06.

7 23. M. EDWARDS referred the Plaintiff to see the PCP on Monday, 6-12-06.

8 24. M. EDWARDS recorded the referral to see a PCP Monday, 6-12-06, on page
 9 2 of attachment "A".

10 25. The Plaintiff informed M. EDWARDS on 6-10-06 that he had taken medica-
 11 tion that was not his on Thursday, according to attachment "A".

12 26. According to attachment "A", Thursday would have been 6-8-06.

13 27. The time period between 6-8-06 through 6-12-06 is 4 days.

14 28. M. EDWARDS did not instruct any health care providers assigned to PBSP
 15 building A-1 to monitor Plaintiff's vital signs.

16 29. M. EDWARDS did not do any type of follow-up to check if the Plaintiff,
 17 in regards to her referral on attachment "A", had seen a PCP on 6-12-06.

18 30. M. EDWARDS is familiar with the medical procedures implemented at PBSP
 19 on 6-10-06.

20 31. M. EDWARDS was employed as a Registered Nurse at PBSP on 6-10-06.

21 32. When an inmate takes an unknown poison or toxic substance, efforts are
 22 made to identify the substance in order to counteract the effects.

23
 24 Dated: *July 11th, 2008*

/s/ Marc Dawson, Plaintiff
 Marc Dawson, Plaintiff

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 26 ///
 27 ///
 28 ///

**ATTACHMENT
A**

| DATE/TIME | DESCRIPTION | PLAN/PT EDUCATION/FOLLOWUP/MD ORDERS/ETC | NOTES |
|-----------------|-----------------------------|--|--------------------|
| | | | |
| | | | |
| | | | |
| 06-10-2006 2000 | DIPHENHYDRAMINE 25MG CAPLET | | VO Risenhoover FNP |
| | | | |
| | | | |

Notes:

06-10-2006 2003

S- "I took the wrong medicine Thursday & this muscle, eye & neck things started Friday in group."
 O- A&O x4, resp even & unlabored, skin cool & dry with good capillary refill, eyes react to light but R pupil is one size larger than L pupil,MAE. Muscles in arms & legs are twitching & jumpy. Head is bent forward & states feels like someone is pushing it down. Can't put his neck straight so head is upright. Denies any pain-just above problems.
 A- all in sensory perception R/T muscle,eye & neck problems.
 P- MOD called & report given. New orders received. Instructed to rest & drink lots of water. To see PCP on Monday 6-12-06
 for all his symptoms. RTC. M Edwards RN